

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

**CASE NO. 24-cv-40 EAW-MJR**

**NOTICE OF MOTION FOR  
TEMPORARY STAY OF PLAINTIFF  
CFPB'S DEADLINES**

**NOTICE OF MOTION FOR TEMPORARY STAY  
OF PLAINTIFF CFPB'S DEADLINES**

MOTION BY

The Consumer Financial Protection  
Bureau.

RELIEF SOUGHT

An order from the Court temporarily  
staying the following deadlines for the  
CFPB:

- 1.** today's deadline to respond to the Joint Objections to the Report and Recommendation on the Motion to Dismiss filed by Defendant Fidelis Legal Support Services, LLC, and Relief Defendants Cameron Christo and the Bush Lake Trust (*see* Dkt 556), and
- 2.** the February 10, 2025 deadline for post-hearing briefing in connection with the evidentiary hearing on January 23-24, 2025 (*see* Dkt. 590).

DATE AND TIME	As soon as practicable.
PLACE	Hon. Elizabeth A. Wolford, Chief Judge Hon. Michael J. Roemer, Magistrate Judge Kenneth B. Keating Federal Building 100 State Street Rochester, New York 14614
SUPPORT	Motion for Temporary Stay of Plaintiff CFPB's Deadlines.
ANSWERING PAPERS	To be filed on schedule as determined by the Court. Plaintiff intends to file a reply.
GROUND FOR RELIEF	Local Rule 7.
DATED: February 4, 2025	Respectfully submitted,  Attorneys for Plaintiff Consumer Financial Protection Bureau  ERIC HALPERIN Enforcement Director  RICHA SHYAM DASGUPTA Deputy Enforcement Director  TIMOTHY M. BELSAN Assistant Litigation Deputy  <u>/s/ Vanessa Buchko</u> Vanessa Buchko E-mail: <a href="mailto:vanessa.buchko@cfpb.gov">vanessa.buchko@cfpb.gov</a> Phone: (202) 435-9593 Joseph Sanders E-mail: <a href="mailto:joseph.sanders@cfpb.gov">joseph.sanders@cfpb.gov</a> Phone: (202) 377-9846 Akash Desai E-mail: <a href="mailto:akash.desai@cfpb.gov">akash.desai@cfpb.gov</a> Phone: (681) 507-1800 Nicole Cabanez E-mail: <a href="mailto:nicole.cabanez@cfpb.gov">nicole.cabanez@cfpb.gov</a> Phone: (202) 445-5479 1700 G Street, NW Washington, DC 20552 Facsimile: (202) 435-7722